

28 July 2017

Variation to the Regional Parks Management Plan / Taitomo Concept Plan

Submission from the Waitakere Ranges Local Board

1. The Waitakere Ranges Local Board (WRLB) welcomes the opportunity to make a submission on the draft Taitomo Concept Plan (CP) and variation to the Regional Parks Management Plan (RPMP).
2. The proposed policy and the revised draft concept support many of the points we made in our earlier submission on the concept plan alone. We strongly support the shift in emphasis to the natural environment over recreation, reflecting the park's status as a Class 1 park under the RPMP classification system.
3. We also support embedding the policies within the RPMP so that the wider vision and policies for the Waitakere Ranges Regional parkland apply to this land.
4. The main focus of our submission is in support of the proposal, though we would like to see more detail on the natural environment and heritage policies.
5. **We wish to be heard at the hearing.**

Introduction

6. Some members of the Board have visited The Gap which helped at forming the views in this submission.
7. Our approach is informed by several understandings about the site:
 - a) It is a unique wilderness area, with extremely high natural values which need to be protected.
 - b) It is near to a visitor destination (Piha) which attracts a very high number of visitors and The Gap is likely to come under significant visitor pressure.
 - c) The opening of the Hillary Trail down this coast will attract more visitors for the spectacular views it will offer.
 - d) Significant fires have destroyed vegetation on northern parts of the site (1994, 1998), and more recently with fires this year (2017). There has been no restoration of this area and these areas have developed into monocultures of gorse.

- e) These areas have now become heavily infested with climbing asparagus of which there have been only small areas of control.
- f) The land is contiguous with Regional Parks' (RP) Tasman Lookout Track at the north, which is similarly infested with gorse and climbing asparagus: the areas should be approached in a coordinated manner.
- g) There is a range of other pest plants on the site that need control.
- h) The site contains kauri, and there may be trees infected with kauri die back.
- i) The site adjoins the only land remaining in the ownership of the iwi, Te Kawerau a Maki, on the whole coast¹.

Variation to the Regional Parks Management Plan / need to integrate new parkland into existing policy framework

- 8. The WRLB supports the proposed variation to the Regional Parks Management Plan 2010 (RPMP), with Taitomo incorporated as a Special Management Zone, though we would like it to go further in describing the natural, cultural and historic values to be protected and enhanced.
- 9. The Waitakere Ranges Regional Park (WRRP) is a Class 1 park with the following vision:

“A regional conservation and scenic park that is managed to protect and enhance its unique, natural, cultural and historic values and wilderness qualities, to provide a place of respite for the people of Auckland, to provide for a range of compatible recreational activities in natural settings, and to cultivate an ethic of stewardship.” (Section 17.19.2).

General – integrated management with Tasman Lookout

- 10. We recommend managing Taitomo and the Tasman Lookout as a single Special Management Zone as the two pieces of land are contiguous and form a natural whole. Tasman and Gap Lookouts are currently a separate zone in the RPMP (page 407, policies 225 – 229) though we believe they should be a single zone.

Weed and pest control (Policy 1, 13, 14, 15)

- 11. We strongly support Policy 1 regarding the need to develop and implement a vegetation management programme, though it needs to be a wider approach than track edge and property boundaries. The policy or management actions in the Special management zone should aim to control and eradicate pest plants, and include a statement around making Taitomo Pest Free within a specific time period.
- 12. The vegetation management programme arguably needs to be developed before priorities are identified so we ask that policy 1a) be changed to a pest free aspiration. The cost of maintaining weed free edges on a weed infested park adds up over time and amounts to poor value. Weed control needs to cover the whole area to prevent re-infestation.

¹ Other than any cultural redress properties on the west coast listed in schedule 3 of Te Kawerau ā Maki Claims Settlement Act 2015

13. We welcome Policy 13 relating to the need to coordinate with the Local Board in developing priorities for weed control and re-planting. The WRLB is working with private landowners in Piha and Huia to survey and control the spread of climbing asparagus. This is a priority action from the Waitakere Ranges Strategic Weed Report. Some of the worst infestations in Piha are in properties around Taitomo. There is a need to coordinate any work council is doing with private landowners or work they may be doing themselves around the park, and it should go without saying that Council needs to control infestations on its own land.
14. We are aware that there are huge amounts of climbing asparagus on the Tasman Lookout Track and the new Byers block. A very small amount of control was carried out by Biosecurity for RPs in 2015/16, however, we are told there is insufficient budget to do more or control other pest plants.
15. It is critical that climbing asparagus control is the priority for this new land, and that it is budgeted for. This needs to go hand-in-hand with other pest plant control including gorse control, pampas control, and ginger and so on. This property is south-west of the Piha residential area so is a prime source of infection for the rest of Piha.
16. The WRLB would like a coordinated approach between itself and RPs, to enable a successful programme of control of pest plants. Currently, the success of the WRLB programme is jeopardised by inaction on the Byers block.
17. The area has significant areas covered in a monoculture of gorse, infested with climbing asparagus which appear to be in “the too-hard basket” for Auckland Council. After 22 years, there are no signs that regeneration of natives is occurring in these areas, indeed, the gorse is providing a nursery for climbing asparagus. This is a source of infestation for the rest of Piha and is also a high fire risk. There is only one rough road into part of the site, so any fire would be very difficult to control as was found in the fires of 1994 and 1998.
18. The Board is alarmed that it is proposed to put new tracks through these gorse -infested, un-restored areas and believes no such new tracks should be cut until the areas are restored and the fire risk reduced. This includes the previously burned area of the Tasman Lookout Track which is similarly surrounded by large areas of 20-year-old gorse, infested with climbing asparagus, where it is proposed to put a link track.
19. It also believes the priority for funding should be pest plant control and restoration of the site, before budget goes into creating tracks, lookouts and other discretionary visitor infrastructure.

Kauri dieback (Policy 2)

20. The variation to the RPMP is being considered at a time when a milestone report on kauri dieback in the Waitakere Ranges is nearing release. Depending on the timing of this there is an opportunity for the hearing panel to consider the implications for the management approach for Taitomo. The Kauri Dieback Report 2017 should at the very least be included as a reference for this policy to note that it is coming up given the potential need for consequential changes.
21. With this as with many other aspects of the Special management zone, there are financial implications that need to be considered so we ask that the policy be accompanied by

recommendations around budgets needed for implementation so that these may be considered in the review of Council's Long Term Plan.

22. The Board is also concerned that despite the land having been in Council ownership for nearly three years – and open to the public all that time – no assessment has been made of the presence of kauri dieback and no hygiene stations have been installed. We have raised this with biosecurity.

Wildlife protection and dogs (Policy 3, 7)

23. The WRLB recently set bylaws for dog rules on local parks. We took the overall approach of providing for dogs at North Piha, as a large off-leash area, and prohibiting dogs on Piha Beach which is a busy beach and has many rocky shelves with wildlife. We took advice from our Council bird experts in doing this and were told that The Gap area was a prime “coming ashore” and breeding area for little blue penguins. There are also fern birds and grey-faced petrels in the area. Tasman Lookout Track is already a dog prohibited area. However, Mercer Bay Loop Track is a dog on-leash area. As the Hillary Trail will connect these areas, it has to be considered how dogs will be kept out of The Gap area. We are strongly of the view that the new parkland at The Gap should be a dog prohibited area in its entirety.
24. The local board recently met with Piha residents to hear their concerns about dog control issues in the area. Everyone takes their dogs down to the Gap, and we heard tell of an occasion with people taking photos of their dog bailing up a penguin.
25. To be effective, good enforcement of these bylaws is required. Council's animal management staff cite the distance of travel to deal with complaints and the resourcing needed for programmed patrols as being the main stumbling block. We would like to see recommendations on resourcing of enforcement for dog control.

Archaeological and cultural sites (Policy 4, 8, 12)

26. The description in the introductory paragraph notes the high cultural significance of Taitomo for Te Kawerau a Maki who own the adjoining Taitomo Island. Policy 4 says archaeological and cultural sites will be protected, and policy 12 says we will maintain engagement with the iwi.
27. We feel more needs to be said about the sites and cultural values to be protected, or if these are not known to recommend further research. The policies should acknowledge and respond to the area's high cultural significance to Te Kawerau. We defer to the iwi on this.
28. It is also important to recognise that the adjoining land – Taitomo Island – is the only land in the ownership of Te Kawerau-a-Maki on the West Coast. As far as the public is concerned, this land is treated as part of the parkland. It is important to spell out how this relationship is to be recognised in the development of the parkland and how Taitomo Island itself is to be protected from excessive visitors.

Visitor management (Policy 6, 8, 9)

29. The annual visitor counts for Piha and other parts of the regional park show the challenge posed in managing the area's attractions without undermining the values that draw people there, (see Attachment A).
30. Places like Kitekite Falls in Piha are already overwhelmed by the number of visitors. With Taitomo being so near to Piha Beach, the Special management zone needs to provide a management approach for dealing with the number of visitors that are likely to come.
31. There needs to be targeted track and activity monitoring to keep an eye on the level of activity to give a feel for how to respond. At the moment there is only a vehicle count of cars going to Piha. Previously there were track counters on tracks at the end of Glen Esk Road and regular intercept surveys which provided information on how many and who was visiting that enabled management strategies to be delivered. These counters and surveys have been stopped, we understand for budgetary reasons. It is essential in opening this new parkland, that strategies are put in place both to monitor the number of visitors and understand what they are doing on the site.
32. There are considerable risks to visitors at the site as well as fragile ecological environments and habitats, as well as wildlife, so it is essential extra resources are directed at the site.
33. Parking is a problem in Piha during peak periods and we support the need to monitor the impact of parking from visitors to Taitomo (Policy 6). It will also be important to monitor the impact on the lookout on Piha Road as a walking road down to The Gap leads off at the same location. There is the potential for this to be used by pedestrians which would overload an already congested area at peak times.
34. We question the statement that only pedestrian access should be provided from Piha Road. We are opposed to the service road being used for anything but service vehicles, but would ask whether some parking needs to be provided at the top otherwise visitors will use the Piha Road lookout carpark for parking, leading to even more congestion there.

Recreation and use management

35. There needs to be a way of managing and monitoring the demand for wedding photography, events, filming. Sports events can be controlled by caps under the SMZ designation, but the Board believes that caps will need to be put in place for other organised activities to avoid conflict with informal park users. The scenic beauty and proximity to Piha Beach will make it a popular setting for wedding photography and commercial filming so we recommend some guidance around this. The use of the walking road for access for filming has already led to complaints from the Piha Residents and Ratepayers who wish to see the natural values of the area protected.
36. Technology advances have seen 'selfie' and drone photography become a cultural phenomenon of sorts in the intervening years since 2010 when the RPMP was written. The Gap is a potentially hazardous area for selfies should people venture near the cliff tops. We are not suggesting a

profusion of signs or safety rails however it is something to think about. Selfie and drone photography were not contemplated at the time of the management plan.

37. There should be a limit on organised sporting events at or passing through Taitomo in line with the WRRP section 17.19.5, policy 28.

Need to ensure infrastructure is subservient to natural environment (Policy 5, 6, 8, 9)

38. The WRLB supports the development of a continuation of the Hillary Trail down the Coast from Mercer Bay Loop Track to Tasman Lookout Track in due course.
39. The Hillary Trail is a Special Management Zone in the RPMP and has a vision and policies. This is another reason why The Gap land needs to be brought into the RPMP to ensure the policies for the Trail apply to this leg in a statutory manner. Without this, this leg would be outside the policies for the Hillary Trail. The RPMP also allows the capping of the number of recreational events in Special Management Zones and this has been done at several high-visitor use locations at Piha already. It may be desirable to cap events in this area, and this would not be possible without including The Gap within the RPMP.
40. It was always intended that the Hillary Trail use existing tracks and these not be upgraded to “great walk” standard, that is, they remain at the standard of the WRRP. It is important this policy is continued. The standard of existing tracks is the Hillary Trail standard.
41. The WRLB supports maintaining existing formed roads and improving existing tracks, but not the formation of new tracks, as budget needs to be prioritised to ecological restoration. Existing tracks can be made more comfortable for walkers – the service road needs improvement for walkers, and tracks from the tennis court to The Gap needs to be taken away from the Blowhole edge and made more walkable (removal of gorse would help!). It is also not clear that there need to be new tracks, it may be that the existing tracks are sufficient. This could be evaluated again at some point in the future. Certainly, new tracks are not a priority.
42. The Blowhole needs special care to prevent wear and tear of this sensitive environment as visitor numbers inevitably increase. We only need to see what has been happening at Kitekite Falls and Karekare Falls to see the potential for extreme visitor pressure at the Blowhole once the word gets out. The Council needs to have management strategies for how it is going to manage this.
43. We are not warm to the notion of “safety barriers” or a “gate” or “rock chicanes” across the entrance to The Blowhole, as this will be a very obvious new built intrusion. We are not aware of any serious accidents at The Blowhole in the over 120 years it has been a tourist destination. We also question the need to place fences at the top of either end of The Blowhole. Tracks should aim to keep visitors away from these edges.
44. Similarly we believe that safety signage and interpretation should be kept to a minimum and carefully sited so it does not spoil or dominate views. The earlier proposal to place safety signage on cliff edges and at The Blowhole itself is not supported. The RPMP policy is to site safety signage at arrival points rather than at the risk site itself, otherwise the Waitakeres would be littered with signs.

45. The earlier proposed six interpretation signs within The Gap itself were too many, and many were proposed in locations which would detract from the natural landscape, so we are pleased these have been reduced. There only need to be one or two signs in the flat grassed area of The Gap. No signs should go in The Blowhole or in the tennis courts itself, except perhaps if it is integrated into a lookout or at entry points.
46. We are concerned about the proposal for a lookout on the tennis court cliffs and ask whether this is necessary. If a lookout point is necessary, we do not favour stonework for barriers (stone seating is acceptable). A similar approach on Tasman Lookout Track had the effect of creating a straight line wall which is visible from a long distance away, also people constantly go around it.
47. The lookouts on Mercer Bay Loop Track and at Te Ahua Point, with posts and wires, sit more lightly on the landscape, and are more successful at constraining people's movement.
48. We believe that the Piha Design Guidelines, developed for RPs at Piha, provide a good framework for infrastructure at The Gap.
49. We support restoration of the selliera radicans herbfield, which is highly valued by the local community. We do not agree with the argument that it should be allowed to completely infill with oioi, toitoi and other species. There is an argument that this process is "natural" but as the tennis courts have been modified over many years, it is hard to argue that letting weeds and natives invade it is "natural". The tennis court area needs to be seen as a cultural landscape, rather a purely natural one.
50. The entire area does not need to be returned to selliera radicans, but particular areas could be restored.
51. The prohibition of mountain biking in policy 7 reflects the long standing policy in that recreational cycling – mountain biking – "is prohibited in the Waitakere Ranges Regional Park at all times." (Section 17.19.6). This has been strongly supported by environmental and local community groups.

Fire risk management (Policy 10)

52. We strongly support the development of a fire risk management plan given recent events, and the need to install water tanks. There will need to be budget allocated for this so we ask that it be included as part of a financial plan for implementing the policies for consideration in the Long Term Plan process.

Summary

- a) The WRLB seeks that policies for the development of the regional park at The Gap / Taitomo are integrated with WRLB policies and programmes
- b) The WRLB believes that the vision statement for Waitakere Ranges Regional Park contained in the RPMP should be the vision statement for The Gap land.
- c) The Taitomo Concept Plan should prioritise restoration and enhancement for implementation and budget allocation.

- d) A plan is needed for restoration and pest plant control: until areas are restored there should be no new tracks or viewing points created.
- e) Restoration is also needed to address the significant fire risk in the previously burned areas.
- f) Track development should follow existing or old tracks, rather than create tracks into new areas, unless it is to re-route tracks for safety reasons eg above the Blow Hole.
- g) All infrastructure should be kept to a minimum and be carefully designed and sited.
- h) Safety signage should be sited at arrival areas not actually at risk sites.
- i) Interpretative signage should be kept to a minimum and carefully sited.
- j) The WRLB supports restoration of the “tennis courts”, at least, in part.
- k) Kauri dieback needs to be managed within the new parkland.
- l) Dogs need to be prohibited within the new parkland because of the wildlife values.
- m) A financial plan needs to be prepared to accompany the Taitomo Special Management Zone and Concept Plan so that these may be considered as part of the Long Term Plan review.

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Western regional parks – visitor counts

Park location	2011/12	2012/13	2013/14	2014/15	2015/16	Diff.
Arataki	188827	172337	178592	180957	183884	1.6
Cornwallis	70087	74490	91239	84451	92340	9.3
Karamatura	26495	28595	33805	40612	29901	26.4
Whaitpu	51568	50920	54778	53150	49840	6.2
Piha (Glen Esk)	41730	48061	65692	76152	155447	104
Cascades -Kauri	95164	105923	130974	175864	73581	58.2
Lake Wainamu	4478	4478	3810	5206	5811	11.6
Fairy Falls	12419	12419	14124	17269	17881	3.5
Muriwai	985031	1017014	1115780	1185478	940163	20.9
Te Rau Puriri	NA	NA	1768	794	3755	78.9
TOTAL WEST SECTOR	1475799	1514236	1690562	1819933	1552603	
		2.60%	11.60%	7.70%	14.80%	

	Missing Data -ave. adjacent months or equivalent months/years
	% increase from previous year
	% decrease from previous year

Piha visitor counts

Piha (Glen Esk) (Tube)												
Months	July	August	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	June
Vehicle numbers 2013-2014 X 0.5	1441	1634	2500	2482	3433	2094	2567	2582	4972	3040	2343	3193
Vehicle numbers 2014-2015	2011	5757	4267	5676	6421	4908	15420	8283	3676	6080	8922	3421
Vehicle numbers 2014-2015 X 0.5	1006	2879	2134	2838	3211	2454	7710	4142	1838	3040	4461	1711
Vehicle numbers 2015-2016	6324	7418	4670	14166	6541	14248	14058	10505	11964	5916	6125	4423
Vehicle numbers 2015-2016 X 0.5	3162	3709	2335	7083	3271	7124	7029	5253	5982	2958	3063	2212
Calbrated people per vehicle.14-15	1.85	1.85	1.85	1.85	1.85	1.85	1.85	1.85	1.85	1.85	1.85	1.85
Calbrated people per vehicle.15-16	2.7	2.7	2.7	2.7	2.6	2.6	2.6	2.6	2.7	2.7	2.7	2.7
People arriving by vehicle 2014-2015	1860	5325	3947	5250	5939	4540	14264	7662	3400	5624	8253	3164
People arriving by vehicle 2015-2016	8537	10014	6305	19124	8503	18522	18275	13657	16151	7987	8269	5971
Other means - Walk (10% est.) 2014-2015	186	533	395	525	594	454	1426	766	340	562	825	316
Other means - Walk (10% est.) 2015-2016	854	1001	630	1912	850	1852	1828	1366	1615	799	827	597
Buses	0	0	0	0	0	0	0	0	0	0	0	0
Total visits 2014-2015	2046	5858	4342	5775	6533	4994	15690	8428	3740	6186	9078	3481
Total visits 2015-2016	9391	11016	6935	21037	9354	20375	20103	15022	17767	8785	9096	6568